

ATTACHMENT II-3

SITE INSPECTION PLAN

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SITE INSPECTION PLAN

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SAFETY-KLEEN GRASSY MOUNTAIN FACILITY SITE INSPECTION PLAN

I. PURPOSE

The RCRA inspection program is designed to assure protection of human health and the environment. This is accomplished by routine examination of permitted units, equipment and containment structures which, in the event of malfunction or deterioration which is not corrected within a timely manner, could jeopardize the health of persons or affect the environment at the facility. Inspections are based upon a schedule which identifies potential or actual non-compliance status of a unit, equipment or containment structure in a manner that allows the owner/operator adequate time to repair or correct the deficiency found by the inspection.

II. SCOPE

The facility's General Manager shall be ultimately responsible for the implementation of the RCRA inspection program. The General Manager can delegate this responsibility to other facility management personnel. Personnel conducting inspections (the Inspector) shall perform, at a minimum, the required inspections in accordance with the Frequency Schedule and documents the inspection findings. For unacceptable conditions found during the inspections, the Inspector shall issue "Remedial Work Orders (RWO)" when the condition or item cannot be corrected within 24 hours of identifying the condition. An Inspector shall perform reinspections to verify the correction or repair.

Inspectors shall possess the necessary qualifications and shall be trained to enable them to perform their duties according to the requirements of the Rules (UAC R315). (Refer to Module II, Attachment II-4.)

III. INSPECTION DOCUMENTATION

RCRA inspections shall be performed, at a minimum, according to the frequency specified in the Inspection Schedule. The schedule outlines the minimum number of required inspection items and events which adequately assesses the condition of the units, equipment and containment structure inspected. At the discretion of the Inspector, or if so directed by facility management, the frequency of any inspection type (i.e. daily, weekly, monthly, annually) can be increased. The frequency can never be decreased from the approved schedule listed in the permit unless approved by the Executive Secretary.

Inspection Forms shall be used for inspection documentation. An Inspection Form shall document the date, time of inspection, name of the Inspector, the status of each inspected

item, the reason for each “not ok” status checked and either the date corrective action was taken along with the initials of the person making that declaration or reference to a Remedial Work Order (RWO).

For the convenience of the Inspectors, certain non-RCRA inspection items can be included on the Inspection Forms. Such items can be added or deleted at the facility's discretion. Non-RCRA inspection items shall be identified as such on the form.

All RCRA Inspection Forms and associated documents (i.e. RWO's, survey notes, test results) shall be incorporated into the facility's Operating Record. These records shall be maintained at the facility in a readily available location and maintained for a minimum of three (3) years from the applicable record's inspection date.

IV. THE FOLLOWING INSPECTION DOCUMENTATION PROCEDURES SHALL BE FOLLOWED:

1. Fill in all of the appropriate blanks on the form (e.g., date, time, etc.).
2. Print and sign your name.
3. Inspect the items as indicated by the frequency as outlined in the schedule.
4. If inspection item is “OK” indicate by marking next to the item in the appropriate column.
5. If inspection item is “NOT OK” indicate by marking next to the item in the appropriate column and describe the problem in the adjacent column.
6. For items that are corrected within 24 hours, the person verifying that the item was corrected writes on the inspection form the date it was corrected and his/her initials.
7. For items that cannot be promptly corrected (e.g., within 24 hours), complete a Remedial Work Order (RWO) and submit to management and indicate on the inspection form that a RWO was written.
8. When a RWO problem is resolved, describe the solution on the RWO form, initial and note the date that remedial action was taken.

V. GRASSY MOUNTAIN FACILITY: INSPECTION SCHEDULE

SITE PERIMETER	INSPECTION ELEMENT: DAILY
SECURITY GATE: (RD01)	Check guard visitor log for current entry
SECURITY LIGHTING: (RD01)	Check operability of facility interior lighting in waste management areas

GRASSY MOUNTAIN FACILITY: INSPECTION SCHEDULE

SECURITY FENCE: (RD01)	Inspect for integrity, breaks or damage
	Check for erosion which would allow for unauthorized entry
	Check gates for proper function
	Check for presence of warning signs at proper intervals and at all gates
	Inspect signs for deterioration (fading, damage, etc.)
SITE PERIMETER	INSPECTION ELEMENT: WEEKLY
PERIMETER RUN-OFF DIKES: (RW01)	Check for evidence of erosion, severe settling, signs of burrowing animals or deterioration
SAFETY/EMERGENCY EQUIPMENT	INSPECTION ELEMENT: DAILY
EMERGENCY RESPONSE TRAILER: (RD04)	Check security tag. If tag is broken or missing, check inventory for presence of all listed equipment
COMMUNICATION EQUIPMENT: (RD04)	Check telephone system to ensure connection and operation of outside line
	Check telephone system for "all page"
	Check Citizens Band Radio
	Check hand-held and base station radio
WIND SOCK: (RD04)	Check for presence
SAFETY/EMERGENCY EQUIPMENT	INSPECTION ELEMENT: WEEKLY
SELF-CONTAINED BREATHING APPARATUS: (RW05)	Check for air pressure at least seventy-five percent (75%)
	Check unit for deterioration or damage

GRASSY MOUNTAIN FACILITY: INSPECTION SCHEDULE

OVERPACKS AND ABSORBENT SUPPLY: (RW05)	Check for a minimum of two (2) empty, overpack drums
	Check for stabilization or solidification agent supply
EMERGENCY SIREN: (RW05)	Operate siren for ten to twenty (10-20) seconds
FIRE FIGHTING WATER SUPPLY: (RW02)	Check storage tank for at least ninety percent (90%) capacity
FIRE HYDRANTS / HOSES: (RW02)	Check for adequate access
	Check for damage or deterioration
EYEWASH / SHOWERS: (RW02)	Check operational status
	Check for damage or deterioration
SAFETY/EMERGENCY EQUIPMENT	INSPECTION ELEMENT: MONTHLY
FIRE EXTINGUISHERS (RM01)	Inspect tags for expiration dates
	Inspect pressure gauges for adequate pressure
EMERGENCY GENERATOR (RM01)	Start and operate to ensure functional status
FIRST AID KITS (RM01)	Inspect to ensure adequate inventory of contents
SAFETY/EMERGENCY EQUIPMENT	INSPECTION ELEMENT: QUARTERLY
CONTINGENCY PLAN DRILL (RQ02)	Conduct a simulation of one of the contingency plan emergency situations.
SAFETY/EMERGENCY EQUIPMENT	INSPECTION ELEMENT: SEMI-ANNUALLY
FIREFIGHTING WATER SUPPLY SYSTEM: (RS01)	Start pump, pressurize lines and open hydrant valves to insure operational status
	Unroll and pressurize firehoses and check for deterioration

GRASSY MOUNTAIN FACILITY: INSPECTION SCHEDULE

	Check firefighting nozzles
CONTAINER MANAGEMENT UNIT	INSPECTION ELEMENT: DAILY
DRUM DOCK AND PADS: (RD05)	Maximum container inventory in each area and record number
	Check for correct aisle space
	Check for "inspection aisles"
	Check dock loading/unloading area and pad(s) for evidence of spills
	Visually evaluate containers for leaks, severe corrosion or deterioration, record load number(s) if appropriate
	Check for labels on all containers
DRUM DOCK AND PADS: (RD06)	Check drum dock and pads to ensure incompatible wastes are segregated
	Check each container closure seals (bung, lid sealing ring, if appropriate)
	Check sumps for liquids
	Check for transfer loads nearing nine (9) days (10 day maximum)
BULK CONTAINER STORAGE (RD07)	INSPECTION ELEMENT: DAILY
	Maximum container inventory and record number in each area
	Check for leaking containers
	Check for load labels and arrival date nearing 90 days
	Check containers for secure lids / tarps in good condition and secure

GRASSY MOUNTAIN FACILITY: INSPECTION SCHEDULE

	Check areas for discoloration, debris
	Check daily inventory for accuracy and location of containers
CONTAINER MANAGEMENT UNIT	INSPECTION ELEMENT: WEEKLY
DRUM DOCK AND PADS: (RW04)	Check base and berm for cracks, gaps, flaking, chips and gouges
	Check roof for leaks, tears or deterioration
	Review "container location log" for proper area designation (e.g. "P2B2, etc.)
	Check for drum stabilization in designated area(s)
CONTAINER MANAGEMENT UNIT	INSPECTION ELEMENT: QUARTERLY
DRUM DOCK, PADS, AND WHEEL WASH: (RQ01)	Cover the bottom of each sump with at least 1 inch of water and allow it to remain for 24 hours. Inspect for drop in liquid level, which might indicate a defective sump.
CONTAINER MANAGEMENT UNIT	INSPECTION ELEMENT: ANNUALLY
DRUM DOCK AND PADS: (RA01)	Fill each sump with water and allow it to remain for 24 hours. Inspect for drop in liquid level, which might indicate a defective sump.
SITE MONITORING SYSTEMS	INSPECTION ELEMENT: DAILY
MONITORING WELLS & PIEZOMETERS OUTSIDE THE SITE SECURITY FENCE: (RD02)	Check wells for damage to casing and cover security
	Check for evidence of tampering with lock or cap

GRASSY MOUNTAIN FACILITY: INSPECTION SCHEDULE

	Check for well visibility and accessible to personnel
METEROROLOGICAL STATION: (RD03)	Check for proper operation of all instruments and recording devices.
	Check for presence of the data logbook.
SITE MONITORING SYSTEMS	INSPECTION ELEMENT: WEEKLY
MONITORING WELLS and PIEZOMETERS INSIDE THE SITE SECURITY FENCE: (RW09)	Check wells for damage to casing and cover security
	Check for evidence of tampering with lock or cap
	Check for well visibility and accessible to personnel
SITE MONITORING SYSTEMS	INSPECTION ELEMENT: ANNUAL
MONITORING WELLS: (RA02)	Check for proper operation of pumps
	Check for insect infestation of casing
SURFACE IMPOUNDMENT (RD08)	INSPECTION ELEMENT: DAILY
	Check for three feet (3') freeboard
	Check loading/unloading areas for evidence of spills
SURFACE IMPOUNDMENT (RW10)	INSPECTION ELEMENT: ≤ 7 DAYS
	Check for the presence of leachate in and the proper functioning of the detection system.

GRASSY MOUNTAIN FACILITY: INSPECTION SCHEDULE

SURFACE IMPOUNDMENT (RW03)	INSPECTION ELEMENT: WEEKLY
	Visually inspect dikes for: 1. Vegetation that could be damaging 2. Burrowing animals 3. Evidence of erosion, leaks or deterioration
	Inspect dikes run-on/run-off ditches and drains for deterioration, improper operations or erosion
	Inspect synthetic liners where exposed for cracks, tears and signs of deterioration
	Check leachate collection risers for secure caps
LANDFILL SYSTEMS	INSPECTION ELEMENT: DAILY
ALL CELLS: (RD13)	Visually inspect for free-standing liquids
	Check for evidence of wind dispersal of waste
LANDFILL SYSTEMS	INSPECTION ELEMENT: ≤ 7 DAYS
ALL CELLS: LEACHATE: (RW06)	Inspect for the presence of liquids or leachate and the proper functioning of the leachate detection/collection systems in all risers.
LANDFILLS SYSTEMS	INSPECTION ELEMENT: WEEKLY
ALL CELLS: LEACHATE: (RW08)	Check leachate pump for operation
	Check leachate collection risers for secure caps.

GRASSY MOUNTAIN FACILITY: INSPECTION SCHEDULE

RCRA CELLS: (RW07)	Inspect synthetic liners where exposed for cracks, tears and signs of deterioration
	Check cell for 12 inches (12") freeboard
	Visually inspect dikes for: 1. Vegetation that could be damaging 2. Burrowing animals 3. Evidence of erosion, leaks or deterioration
	Inspect run-on/run-off ditches and drains for deterioration, improper operations or erosion
CLOSED CELLS: (RW07)	Check for erosion, settling and subsidence
TANK SYSTEMS	INSPECTION ELEMENT: DAILY (Tank systems tagged as "Out-of-Service" / inactive, may be omitted)
CAUSTIC STORAGE (Out-of-Service); (RD14) WASTE SOLVENT STORAGE (Out-of-Service); (RD15) ACIDIC WASTE STORAGE (Out-of-Service);(RD14) WASTE & TREATED LIQUID STORAGE SYSTEMS (Out-of-Service);(RD14) LEACHATE STORAGE: (RD11)	Check the following for proper operation:
	1. Manual operating valves
	2. High level alarms o power source o operating mechanisms o protective overlays o sounding mechanism
	3. Check valve, piping, and pumps
	4. Discharge controls
LEACHATE SECONDARY CONTAINMENT: (RD11)	Check for liquid in sump(s)
	Inspect area around tank system for evidence of leaking (discoloration, vegetative stress)
LEACHATE TANK SYSTEMS: (RD11)	Check liquid level log for entry
	Check for evidence of corrosion, deterioration, or leaking (ancillary equipment)

GRASSY MOUNTAIN FACILITY: INSPECTION SCHEDULE

ALL TANK SYSTEMS	INSPECTION ELEMENT: DAILY
ALL SECONDARY CONTAINMENT: (RD11), (RD12)	Check for cracks in the cement
	Check for liquid in sump(s)
STABILIZATION TANK SYSTEMS	INSPECTION ELEMENT: DAILY
SECONDARY CONTAINMENT (RD10)	Check for liquid
	Check area around tank system for evidence of leaking (discoloration, etc.)
	Check for evidence of corrosion, deterioration, or leaking (ancillary equipment)
MISCELLANEOUS:	INSPECTION ELEMENT: DAILY
TRANSFER AREA: (RD09)	Check tank unloading areas for evidence of spills
WHEEL WASH AREA: (RD09)	Check for evidence of spills and discoloration
SAMPLING AREA: (RD09)	Check for evidence of spills and discoloration
CONSTRUCTION INSPECTION SCHEDULE: As determined by CQA Plan.	

APPENDIX I

INSPECTION FORMS